

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation to Develop
Additional Methods to Implement the California
Renewables Portfolio Standard Program

Rulemaking 06-02-012
(Filed February 16, 2006)

**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON
THE DECISION AUTHORIZING USE OF TRADABLE RENEWABLE
ENERGY CREDITS FOR COMPLIANCE WITH THE CALIFORNIA
RENEWABLES PORTFOLIO STANDARD**

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Commission's Rules of Practices and Procedure, the Division of Ratepayers Advocates (DRA) hereby submits the following comments on the Proposed Decision (PD) of Administrative Law Judge (ALJ) Anne Simon, authorizing the use of tradable renewable energy credits (TRECs) for compliance with the California Renewables Portfolio Standard (RPS) program.

This PD appears to supersede an earlier PD issued on October 29, 2008 on the same issue, because it is not an alternate to the earlier PD. DRA filed comments on the earlier PD on November 18, 2008, and to the extent that the current PD and the earlier one remain the same, DRA's comments on the earlier PD are equally applicable to this PD and are hereby incorporated by reference. However, to the extent that the current PD has changed aspects of the earlier PD, DRA addresses those changes in these comments.

DRA commends the Commission for significantly improving on earlier PD by setting a 5 percent procurement limit on TRECs in this PD, whereas the October 29, 2008 PD did not have any limit. Further the current PD acknowledges that, at present, TRECs are only an additional compliance tool for meeting RPS obligations. DRA is also encouraged that the current PD recognizes that there are no real sources for TRECs in the immediate future since existing RPS-eligible generation is largely in utilities' portfolios, construction of RPS-eligible generation outside of California is uncertain and the

technical requirements for allowing distributed generation (DG) installation make it impossible to estimate the availability of TRECs from DG.

Notwithstanding the marked improvement of a 5 percent TREC procurement limit DRA continues to have substantial concerns with the use of TRECs. Thus, DRA urges the Commission to withhold its decision on this PD until the concerns with the proposed design of a market for tradable energy credits can be better addressed and resolved. This delay is necessary because this PD and the original PD contradict each other. Unless, this PD is clarified the marked improvement it provided by limiting TRECs procurement to 5 percent would be eliminated by the other aspects of the PD that authorize among other things, hoarding of existing TRECs for future trades. For these reasons, DRA opposes the PD as currently written and recommends that the Commission address the legal and factual flaws before adopting it in any form.

II. DRA SUPPORTS 5 PERCENT LIMIT ON THE TRECs PERMANENT

The most commendable aspect of the PD is the 5 percent limit it places on the procurement of TRECs for RPS compliance, but this limit is inconsistent with several design elements the PD also approves for the TREC market, such as earmarking and banking. Further, the PD states that the 5 percent limit is only temporary, but fails to state how the rationale for the limit supports any changes in the near future or until the RPS deadline of 2010.

A. The Rules Governing the Banking and Earmarking of TRECs Contracts Should Be Clarified to Prevent Loopholes in RPS Program Compliance.

As DRA and other parties have expressed in previous comments, it is important to limit the amount of RECs contracts that qualify for RPS compliance to ensure that IOUs continue to pursue long-term renewable energy contracts. However, as written, the PD places no limit on the amount of TRECs contracts an IOU can bank or earmark. The two-year trial cap of 5% of an IOUs annual procurement target (APT) as TRECs contracts that qualify for RPS compliance is insufficient. DRA's concern is that the

current language of the PD will promote the banking and earmarking of excess TRECs contracts that may later be applied to RPS compliance in excess of the 5% of APT threshold.

1. Banking and earmarking of RECs contracts should be disallowed.

The Commission should not equate banking and earmarking of bundled renewable resources with banking and earmarking of TRECs as both have a markedly different effect on the RPS program and the market. Thus, the staff white paper released by the Commission clearly states that “...the current provisions allowing unlimited banking should be revisited and changed to a finite time period, consistent with the objective of encouraging market liquidity and ensuring that the RPS provides ongoing and consistent demand for renewable generation.”¹

Similarly, the Energy Division’s (ED) Straw Proposal on TRECs also advises against earmarking of TRECs of any sort for RPS compliance. DRA agrees with the position taken in the staff white paper and straw proposal that unlimited banking and earmarking of TRECs contracts contradict the goals of the RPS program and thus the Commission should disallow the banking or earmarking of any and all TRECs contracts. It is unclear to DRA why the IOUs should be permitted to engage in forward and back counting at all if the Commission intends to uphold its cap of 5% of APT as a limit on TRECs.

The problem with the IOU and RPS compliance has not been their ability to secure REC, TREC, and other out-of-state renewable energy contracts but with their ability to secure long-term eligible renewable energy contracts with in-state facilities or to use such long-term contracts to create incentives for new developments.

The intent behind allowing IOUs to earmark and bank renewable energy contracts and excess surplus is to account for the lumpy cycle of procurement associated with long-

¹ Staff White Paper *Renewable Energy Certificates and the California Renewables Portfolio Standard Program* p. 5.

term renewable facility development. Banking essentially gives IOUs the opportunity to apply current surplus to anticipated future non-compliance. Earmarking allows IOUs with known future contracts to apply these contracts to past deficiencies. Given that one of the primary reasons for the PD's imposition of a 5 percent cap on TREC procurement is the lack of sufficient TRECs for utilities to use in meeting their RPS compliance, earmarking and banking will only undermine both reasons.

Regarding the availability of TRECs in the 2009 through the 2011 timeframe in which the PD would apply, the PD stated:

[I]t appears that existing RPS-eligible generation is largely already included in utilities' portfolios. Many utility-scale projects are under contract, but are not yet build and delivering energy. The construction of new RPS-eligible generation not located in California is uncertain, and the availability of TRECs from that generation is similarly unknown. The use of TRECs from new DG installations is dependent both upon the technical requirements of WREGIS and upon whether the DG owner wishes to retain the RECs to support its own green claims. Since TRECs come from RPS-eligible generation, and the supply of new RPS-eligible generation not already committed to RPS compliance is likely to be limited, the supply of TRECs in the next few years will be similarly limited.

(PD, p.20.)

Thus to permit the IOUs to engage in unlimited banking and earmarking of RECs contracts will do nothing to assist them with RPS compliance as a majority of these contracts are with existing energy producing facilities; and will not result in constructing any new renewable facilities. Such banked and earmarked contracts would provide no additional attributes and would only further an IOUs reliance on such contracts to meet RPS compliance. Since TRECs do not promote RPS development, no evidence has been presented to support that TRECs contribute to new facility development and in many instances may hinder new facility development, earmarking and banking of TRECs contracts, even with a three year cap, is insufficient for the purpose of meeting RPS goals.

Secondary to ensuring the continuance of long-term contracts in the RPS program, the banking of TRECs contracts for a maximum of three years will create artificial scarcity of RECs in an already flawed market. Thus the clear outcome of the TRECs market will not be exposed. Banking of TRECs contracts, even with a limit of three years, can essentially be considered a form of hoarding. When a contract is banked, it is essentially removed from the market. Thus, the Commission, California Energy Commission (CEC) and WREGIS will lack the opportunity to monitor and track this contract. This monitoring is critical during the two-year trial period, especially as the Commission has set forth five criteria to consider at the end of this time, to determine how both the REC price cap and 5% of APT cap will be assessed going forward. If some RECs contracts are removed from this two-year assessment, the results may not accurate.

If utilities are allowed to earmark and bank TRECs, then utilities with greater opportunities to obtain TRECs would be able to assert significant market power over the prices the market may have set for TRECs.

As TURN, GPI, UCS and Aglet note, the ability of RPS procurement to promote stable electricity prices depends in part on the use of long-term fixed-price contracts for energy delivery. TREC deals, no matter the length of their term or the length of time the generation facility has been operating, do not provide for the long-term delivery of fixed-price power, and thus do not contribute to price stability.

(PD, p.27.)

III. THE COMMISSION SHOULD CLARIFY HOW IT WILL ADDRESS THE POTENTIAL DANGERS WITHIN THE TREC MARKET AS IT IS CURRENTLY PROPOSED.

Although the PD is a marked improvement over the October 29, 2008 version, it still fails to address several flaws in the market for TRECs

A. The TREC market trial period should be extended to a minimum of five years.

As the PD states and parties agree, “at least in the next three or four years, the demand for TRECs for California RPS compliance is highly likely to exceed the limited

foreseeable supply.”² This is an acknowledgment that the “market” is already flawed at its inception. Due to this known flaw with the TRECs market, the two-year trial period set forth in this PD is not enough time to accurately observe and make judgment on how TREC transactions and the market will influence California’s RPS program.

If the Commission decides to act on this PD at all, the trial period should be extended to at least a five-year time frame to give the Commission ample time to observe and make an informed decision on the interplay of TRECs and the RPS program going forward. The CEC is two years behind in its assessment of the IOUs’ RPS annual compliance filings. At this rate the outcomes and affects of the Commission’s proposed decisions will not be presented until *after* the Commission’s two-year trial period has ended. Thus, it is imperative that the Commission work with the CEC to hasten its review of the IOU compliance reports so that this information can be applicable and accessible during the trial period. If the CEC and Commission are both vested with the authority to oversee WREGIS and ensure its implementation, WREGIS would not be able to function optimally without updated and accurate information about the IOUs progress on the RPS program.

B. The Commission Should Define What It Means By A Mature TREC Market

A lot of the proposals in the PD are conditioned on the development of a mature TRECs market, but the PD does not define what would constitute a mature TREC market in view of the limitations it has already acknowledged with the current design of this market.

For instance, the PD conditions the 5 percent cap on procurement of TRECs on the maturity of the market.

To support the price stability that is one of the potential benefits of contracts for RPS-eligible energy, this decision provides a temporary limit on the use of TRECs for RPS compliance by the three large investor-owned utilities (IOUs).

² Proposed Decision on TRECs pg. 38

To protect ratepayers from excessive payments for TRECs in the early stages of the TREC market, a transitional price cap on TRECs used for RPS compliance by all IOUs will be instituted. There will be opportunities for review of both limits as the TREC market matures.

(PD, p.3.)

It is important that parties know how the Commission defines a mature market in order to understand the effect that the PD's other design elements would have on such a market. Given the fact that there will not be enough TRECs in the market in the next few years, there will likely not be price stability and the impact of the proposed banking and earmarking design is uncertain, it is difficult to define a mature market. If the Commission goes forward with the PD, it should clarify the elements of a mature market, considering the above factors.

IV. THE QUALIFYING ATTRIBUTES OF RECS-ONLY CONTRACTS SHOULD BE CLARIFIED

The Commission should make existing out-of-state contracts with complex delivery mechanisms, including firming and shaping elements, TRECs. In the past, many contracts were purchased for the sole purpose of unbundling their attributes and then using those attributes for RPS compliance. However, this method also creates a complex delivery scheme that is inefficient and should be addressed if the Commission is going to authorize TRECs at all.

A. The Commission should uphold its proposed decision to label contracts indexed to future energy prices as TRECs transactions.

As other parties have argued and the Commission admits in this PD: "TRECs deals, no matter the length of their term or the length of time the generation facility has been operating, do not provide for the long-term delivery of fixed-price power, and thus do not contribute to price stability."³ Since one of the most prominent economic

³ PD, March 26, 2009, pg. 27

attributes of renewable energy is to promote price stability, DRA supports the decision set forth in this proceeding to label REC contracts indexed to future energy prices as de facto TRECs or REC-only contracts.

DRA strongly objects to any attempt to modify the PD's language to allow contracts indexed to gas qualify for RPS compliance. Such contracts are inconsistent with the primary goals of the RPS program and do not support new renewable energy resources. The Commission should state more emphatically that any contracts in this category that are indexed to future energy prices are REC-only contracts and distinguish these contracts from those that provide some energy attributes of the RPS program.

B. The Commission should expand on the characteristics of unbundled contract in the PD to account for contracts with multiple energy delivery options.

The Commission should further extend this definition of REC-only contracts to the various complex forms of firmed and shaped energy contracts currently being submitted as advice letters for Commission approval. Such contracts with multiple energy delivery options would, under this PD, straddle the fine line between a bundled and unbundled or REC-only deal. For example, recent out-of-state renewable REC contracts requesting Commission approval have consisted of complex delivery options that allow for the energy in some instances to be delivered directly to California and in other instances to be sold at various out-of-state hubs. These contracts, more often than not, are indexed to forward energy prices and do not include the costs of transmission.

Thus DRA requests that the Commission expand its definition of REC-only contracts to include contracts with multiple energy delivery options, to clarify the many shades of grey between a bundled and unbundled contract. The Commission should define the following contracts; Advice Letter (AL) 2319-E, 2275-E, and Resolutions E-4128, E-4170, E-4204 and E-4216 using this criteria/context for REC-only transactions

V. STANDARD TERMS AND CONDITIONS SHOULD BE MODIFIED

DRA believes that in an effort to eliminate double counting of renewable energy certificates and ensure that WREGIS has the tools and authority to properly oversee and

regulate the certification, buying, selling, and trading of TRECs, the standard terms and conditions governing all TRECs transactions should be modified.

A. The contract between seller and buyer should include a clause requiring the seller of TRECs be prohibited from reporting or selling the REC in that transaction to another entity

DRA supports the language of the new and revised standard terms and conditions but suggests that STC REC-2 *Tracking of RECs in WREGIS* be amended to state that the seller of a TREC under contractual obligation to a California LSE cannot--either in the WREGIS system or another similar tracking system for tradable renewable energy credits--simultaneously sell the same energy output or green attributes to another party.

Rules guiding WREGIS transactions require “all registered WREGIS account holders [to] attest that they are not reporting generation data for generation that has been reported to another tracking system and that they are not selling RECs representing the same generation data outside WREGIS...”⁴ however, it is unclear from this statement whether the seller is required to report this information only once upon its initial registration with WREGIS or for each individual transaction it conducts through WREGIS. Thus, to clarify this statement and ensure against double counting, DRA recommends the Commission adopt a modification to the standard terms and conditions that would require the seller to present this information and verification to the buyer upon each transaction it engages in within WREGIS.

This modification to STC REC-2 would hold the seller legally responsible, and accountable to the buyer, in WREGIS, and will ensure that the green attribute purchased is not being accounted for or transacted in another tracking system or market. The issue of double-counting in the RECs market is a real and impending challenge to the RPS program and will require properly enforced rules and regulations to ensure that future problems do not arise.

⁴ Resolution E-4178 pg. 34

B. WREGIS should be required to perform annual audits on account holders.

The Commission should work with the California Energy Commission (CEC) to require that WREGIS perform annual audits on WREGIS account holders, especially certified generating units, to insure against double counting. Although Resolution-4178 gives the Western Electricity Coordinating Council (WECC) the “right to audit Account Holder’s relevant records to verify any information submitted by Account Holder to the WECC...”⁵ The REC tracking system and California’s RPS program would be best served if WREGIS is also vested with the authority to audit account holders. Annual audits performed by WREGIS would keep information on account holders current and provide a double assurance to TRECs buyers and California ratepayers that account holders active in WREGIS are being monitored and are not simultaneously selling RECs in multiple TRECs markets.

VI. CONCLUSION

For all the foregoing reasons, DRA recommends that the Commission defer its decision on this matter until the concerns in the proposed design of a market for TRECs can be better addressed and resolved. Should the Commission decide to go forward with a decision to establish a TRECs market, DRA recommends adoption the changes discussed in these comments and DRA’s proposed changes to the findings of fact and conclusions of law.

Respectfully submitted,

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⁵ Resolution E-4178 pg. 34

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April 15, 2009

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I hereby certify that I have this day served a copy of “**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE DECISION AUTHORIZING USE OF TRADABLE RENEWABLE ENERGY CREDITS FOR COMPLIANCE WITH THE CALIFORNIA RENEWABLES PORTFOLIO STANDARD**” in **R.06-02-012** by using the following service:

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Executed on April 15, 2009 at San Francisco, California.

/s/ MARTHA PEREZ

Martha Perez

N O T I C E

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